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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA

In re:

JOHN HOWARD HELLIWELL

TAMMY MARIE HELLIWELL

Debtor

Case No. 13-21046
Hearing Date: June 18, 2013
Hearing Time: 2:00 PM
Hon. Christopher M. Klein
Courtroom 33
DCN: SCR-04

MOTION TO CONFIRM
AMENDED CHAPTER 13 PLAN

Stephen C. Ruehmann, the attorney for John Howard Helliwell and Tammy Marie Helliwell, the Debtors herein, hereby moves this Court for an Order Confirming Chapter 13 Plan. In support of this Motion, the Debtors respectfully represent:

1. This case was commenced by the filing of a voluntary petition on behalf of the Debtors on January 26, 2013. David P. Cusick has been duly appointed to serve as the Chapter 13 Trustee on this case.
2. Pursuant to Title 11, US Codes §341, a Meeting of Creditors was conducted by the Chapter 13 Trustee on February 28, 2103. The Trustee has since concluded this meeting.

3. A Chapter 13 Plan was filed on January 26, 2013.
4. The Plan has been proposed in good faith.
5. The Plan proposes to pay the allowed unsecured claims an amount not less than they would have been paid if the estate of the Debtors was liquidated under the provisions of Title 11, US Codes, Chapter 7. Pursuant to Form B22c, this is a "0%" Plan.
6. The Debtors have made all payments to the Trustee pursuant to the provisions of the Plan.
7. The Debtors have no Domestic Support Obligations, as defined.
8. Pursuant to 11 US Codes §1308, the Debtors have filed all applicable Federal, State and Local tax returns.

RESTATEMENT

WHEREFORE, the Debtors request the Court to confirm the Amended Chapter 13 Plan.

Respectfully submitted on April 29, 2013

/s/ Stephen C. Ruehmann
Stephen C. Ruehmann